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MEMO ENDORSED

July 17, 2015

VIA ECF

Hon. Colleen McMahon
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: *Martina Henry v. Capital One Bank (USA), N.A.; Chase Bank USA, N.A.; Wells Fargo Financial National Bank; et al.*
Case # 1:15-cv-03241-CM

Dear Judge McMahon:

This firm was recently retained to represent defendant Wells Fargo Financial National Bank ("Wells Fargo") in the above-referenced action.

We write to respectfully request that Wells Fargo be granted leave to answer, move, or otherwise respond to the Complaint of plaintiff Martina Henry on or before July 27, 2015. Wells Fargo has no record of being served with process, and despite repeated requests, plaintiff's counsel has failed to provide proof of service. As such, Wells Fargo makes this application out of an abundance of caution and to avoid any unnecessary motion practice. We have attempted to obtain plaintiff's counsel's consent to the requested relief, but, to date, he has not responded to our request.

Respectfully submitted,
/s/ Robin L. Muir
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USDC SDNY DOCUMENT ELECTRONICALLY FILED DOC #: DATE FILED: 7/21/15
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CERTIFICATE OF SERVICE

I hereby certify that on this 17th day of July, 2015, I caused the foregoing document to be filed electronically with the Clerk of Court through ECF, and that ECF will send an e-notice to all appearing parties. Parties may access this filing through the Court's ECF System.

/s/ Robin L. Muir

Robin L. Muir, Esq.